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June 8, 2015

VIA ECF

Hon. Debra Freeman
United States Magistrate Judge
Southern District of New York
500 Pearl St.
New York, NY 10007

RE: *Harvey H. Jay, M.D., v. Spectrum Brands Holdings, Inc., et al.*
13-cv-8137 (LTS) (DCF)

Dear Judge Freeman:

In accordance with Your Honor's Order, dated June 2, 2015 [Dkt. No. 92], Your Honor's Individual Rules of Practice, and Local Rule 7.1(d), the parties hereby jointly and respectfully request that the deadlines set forth in Judge Swain's Pre-Trial Scheduling Order No. 1 [Dkt. No. 23], be modified as follows:

Deadline for All Non-Expert Discovery	June 11, 2015	August 10, 2015
Deadline for Expert Witness Disclosures described in Rule 26(a)(2) of the FRCP	July 11, 2015	September 9, 2015
Deadline for Rebuttal Expert Disclosures	August 10, 2015	October 9, 2015
Deadline for All Expert Witness Discovery	September 9, 2015	November 9, 2015
Deadline for filing Joint Preliminary Trial Report	June 25, 2015	August 24, 2015

Deadline for filing Dispositive Pre Trial Motions	October 9, 2015	December 8, 2015
Deadline for commencing any <u>Daubert</u> motion practice	October 19, 2015 [Dkt. No. 87]	December 21, 2015
Deadline for commencing other motions, including but not limited to non- <u>Daubert</u> motions <u>in limine</u> relating to evidentiary issues	November 18, 2015 [Dkt. No. 87]	January 20, 2016
Deadline for filing Joint Final Trial Report	November 20, 2015 [Dkt. No. 87]	January 22, 2016
Final Pre-Trial Conference	December 18, 2015 [Dkt. No. 87]	February 19, 2016, at 10:00 a.m.

Respectfully submitted,

DILWORTH PAXSON LLP

By: /s/ John C. Kessler

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cc: All counsel (via ECF)